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July 30, 2019

VIA ECF (Without enclosures)

HAND DELIVERED FOR IN CAMERA REVIEW

The Honorable Cheryl L. Pollak

United States District Court

Eastern District of New York

225 Cadman Plaza East

Brooklyn, N.Y. 11201

Re: Toussie, et al., v. Allstate Insurance Co.
Case No. 15-cv-5235 (ARR)(CLP)

Dear Judge Pollak:

In my letter of July 11, I represented to the Court that I had provided complete copies of the Toussies' federal tax returns for the Court's review. It has come to my attention that the returns provided were not complete, and that there were in fact certain filed addendums, disclosure statements and preparers notes that accompanied the returns that had not been provided to the Court. I write to make this Court aware of same and to provide of same and to provide copies for the Court's in camera review.

With the exception of the Disclosure Statement/Preparer's Notes omitted from the returns provided, it does not appear that any of the addendums are germane to the issues in this case. Nonetheless, all are enclosed for your review in camera. I have enclosed the Declaration of the Toussies' accountant, who both prepared the returns and forwarded the copies that were provided to the Court in compliance with the Order, in explanation of the oversight. This Declaration is being submitted for in camera review only so as to preserve the Toussies' objection with respect to the disclosure of his identity for appeal.

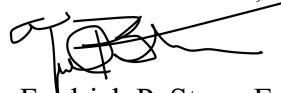
Plaintiffs are today filing objections with Judge Ross with respect to Your Honor's July 26, 2019 Order and to request a stay thereof. Based upon a review of the Order, and the non-redacted portions of the returns that we are directed to turn over, we expect that Your Honor will also direct the Toussies to turn over the Disclosure Statement/Preparer's Notes. Regardless, we respectfully request that any additional unredacted materials that you determine should be produced to Allstate also be made available for viewing by Judge Ross so that she has an accurate record of the returns as you have redacted them.

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However, because we assume that you will redact the remainder of the addendums, we do not intend to file them with our objections to Judge Ross.

Thank you for your attention to this matter and apologize for the obvious inconvenience to the Court.

Yours,
SCHEYER & STERN, L.L.C.

A handwritten signature in black ink, appearing to be "F. P. Stern", written over a horizontal line.

By: Fredrick P. Stern, Esq.

Encl.